

#### IV. REMARKS

By this amendment, claims 5 and 9 have been amended. As a result, claims 1-13 are pending in this application. Applicants are not conceding in this application that those claims are not patentable over the art cited by the Office, as the present claim amendments and cancellations are only for facilitating expeditious prosecution of the subject matter. Applicants do not acquiesce in the correctness of the rejections and reserve the right to present specific arguments regarding any rejected claims not specifically addressed. Further, Applicants reserve the right to pursue the full scope of the subject matter of the original claims in a subsequent patent application that claims priority to the instant application. Reconsideration in view of the following remarks is respectfully requested.

In the Office Action, the drawings are objected to for allegedly not being referred to in the detailed description within the specification. Claims 5-12 are rejected under 35 U.S.C. §101 as allegedly being directed to non-statutory subject matter. Claims 1, 3, 5, 7, 9, and 13 are rejected under 35 U.S.C. §103(a) as allegedly being unpatentable over Kaplan et al. (U.S. Patent: 5,594,641) in view of Beesley et al. (“Draft: Finite-State Morphology: Xerox Tool and Techniques,” 1999), hereinafter “Kaplan” and “Beesley” respectively. Claims 2, 6, and 10 are rejected under 35 U.S.C. §103(a) as allegedly being unpatentable over Kaplan in view of Beesley and further in view of Lee et al. (U.S. Patent No. 4,939,639), hereinafter “Lee.” Claims 4, 8 and 12 are rejected under 35 U.S.C. §103(a) as allegedly being unpatentable over Kaplan in view of Beesley and further in view of Schabes *et al.* (U.S. Patent No. 6,424,983), hereafter “Schabes.”

#### **A. OBJECTIONS TO THE DRAWINGS**

The Office has objected to the drawings for allegedly not being referred to in the detailed description within the specification. Applicants have amended the detailed description within the specification to refer to FIG. 2 and FIG. 3. No new matter has been added. Accordingly, Applicants respectfully request that the objection be withdrawn.

#### **B. REJECTION OF CLAIMS 5-12 UNDER 35 U.S.C. §101**

The Office has rejected claims 5-12 for allegedly being directed to non-statutory subject matter. Specifically, the Office asserts that the claimed invention does not result in a physical transformation or produce a useful, concrete, and tangible result. Applicants have amended claim 5 to include “generating” as suggested by the Office. Further, Applicants have amended claim 9 to include a “computer program product encoded on a computer readable storage medium.” Applicants respectfully submit that these amendments satisfy the Office’s definition of statutory subject matter. Accordingly, Applicants request that the rejection be withdrawn.

### **C. REJECTION OF CLAIMS 1, 3, 5, 7, 9, 11 AND 13 UNDER 35 U.S.C. §103(a)**

With regard to the 35 U.S.C. §103(a) rejection over Kaplan in view of Beesley, Applicants assert that Kaplan in view of Beesley does not teach, suggest, or make obvious, each and every feature of the claimed invention. For example, with respect to independent claims 1, 5, and 9, Applicants continue to submit that Kaplan fails to teach a cut and paste code extended by a gloss code. The Office cites a passage of Kaplan that it asserts describes “a cut and paste code, which indicates how many characters should be cut from the end of a surface form of a word and pasted to produce a particular variation.” However, nowhere in the passage of Kaplan cited by the Office is it indicated that the tag codes include an indication of how many characters should be cut from the end of a surface form of a word or how many characters should be subsequently added. To further the Offices point, the Office references Fig. 10-11a. Applicants submit that these figures do not show the cut and paste methodology. The figures referenced merely show lengthening of a given “substring.” Nowhere in the figures are the substrings cut down, nor is there any indication of how many characters would be cut and how many characters should be pasted.

The Office further cites a passage of Beesley, alleging that Beesley discloses “code that indicates whether at least part of the orthographic variation should be converted between upper and lower case.” Applicants submit that nowhere in the passage of Beesley cited by the Office is it specified that such an indication takes place. Beesley merely provides “representation of a simple orthographic rule.” Code for the indication of the use of such a rule is not taught or made obvious by either Kaplan or Beesley. Accordingly, Applicants respectfully request that the rejection be withdrawn.

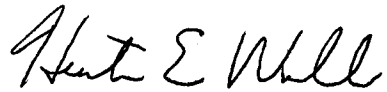
With respect to dependent claims, Applicants herein incorporate the arguments presented above with respect to the independent claims from which the claims depend. Furthermore, Applicants submit that all dependant claims are allowable based on their own distinct features. Since the cited art does not teach each and every feature of the claimed invention, Applicants respectfully request withdrawal of this rejection.

## **V. CONCLUSION**

In addition to the above arguments, Applicants submit that each of the pending claims is patentable for one or more additional unique features. To this extent, Applicants do not acquiesce to the Office's interpretation of the claimed subject matter or the references used in rejecting the claimed subject matter. Additionally, Applicants do not acquiesce to the Office's combinations and modifications of the various references or the motives cited for such combinations and modifications. These features and the appropriateness of the Office's combinations and modifications have not been separately addressed herein for brevity. However, Applicants reserve the right to present such arguments in a later response should one be necessary.

In light of the above, Applicants respectfully submit that all claims are in condition for allowance. Should the Examiner require anything further to place the application in better condition for allowance, the Examiner is invited to contact Applicants' undersigned representative at the number listed below.

Respectfully submitted,

  
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